

HANSON BRIDGETT LLP
RAYMOND F. LYNCH, SBN 119065
rlynch@hansonbridgett.com
MOLLY L. KABAN, SBN 232477
mkaban@hansonbridgett.com
JANE M. FEDDES, SBN 282117
jfeddes@hansonbridgett.com
425 Market Street, 26th Floor
San Francisco, California 94105
Telephone: (415) 777-3200
Facsimile: (415) 541-9366

Attorneys for Defendant
BANK OF AMERICA, N.A.

LAURENCE F. PADWAY, #83914
LAW OFFICES OF LAURENCE F. PADWAY
1516 Oak Street, Suite 109
Alameda, CA 94501
Telephone: (510) 814-6100
Facsimile: (510) 814-0650

Attorneys for Plaintiff
OMID BEHJOU

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

OMID BEHJOU,

Plaintiff,

v.

BANK OF AMERICA CORPORATION,

Defendant.

CASE NO. CV 12 1590 NC

JOINT STIPULATION OF DISMISSAL
WITH PREJUDICE AND ~~PROPOSED~~
ORDER PURSUANT TO FRCP 41(a)(1)
and (2)

Judge: Hon. Nathanael M. Cousins

Plaintiff OMID BEHJOU ("Plaintiff") and Defendant BANK OF AMERICA CORPORATION ("Defendant"), by and through their attorneys of record, file this Stipulation and Order of Dismissal with Prejudice pursuant to Federal Rule of Civil Procedure sections 41(a)(1) and (2).

WHEREAS, Plaintiff filed this lawsuit on March 29, 2012.

1 WHEREAS, Plaintiff and Defendant have entered into a Settlement Agreement
2 and Release which settles all aspects of the lawsuit against Defendant without
3 admission of liability of wrongdoing, liability or fault.

4 WHEREAS, Plaintiff moves to dismiss the with prejudice the lawsuit against
5 Defendant pursuant to FRCP 41(a)(1) and (2). Each side shall pay its own attorneys'
6 fees and costs except as expressly set forth in the Settlement Agreement and Release.

7 WHEREAS Defendant, who has answered the complaint, agrees to the dismissal
8 with prejudice. The case is not a class action, and no receiver has been appointed.

9 Wherefore, Plaintiff and Defendant, by and through their attorneys of record, so
10 stipulate.

11 DATED: December 4, 2013

HANSON BRIDGETT LLP

13 By: /S/ RAYMOND F. LYNCH

14 RAYMOND F. LYNCH

15 MOLLY L. KABAN

16 JANE M. FEDDES

Attorneys for Defendant

BANK OF AMERICA

17 DATED: December 4, 2013

LAW OFFICES OF LAURENCE F. PADWAY

19 By: /S/ LAURENCE F. PADWAY

20 LAURENCE F. PADWAY

21 Attorneys for Plaintiff

22 OMID BEHJOU

23 IT IS SO ORDERED.

24 Dated: January 8, 2014, 2013

